



Gulfstream Star Inc.

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December 30, 2013

To: Marlene H. Dortch, Secretary

Federal Communications Commission

Office of the Secretary

445 12th Street, SW

Washington, DC 20554

Subject: Appeal of USAC Funding Decision - Docket 02-6

Request for Review

We were recently notified by USAC that they are rescinding funding for Bogen systems that we installed and maintained for the following FRNs.

| <u>FRN</u> | <u>School Name</u>         | <u>School Year</u> |
|------------|----------------------------|--------------------|
| 1996286    | CHABAD OF NORTHEAST QUEENS | 2010               |
| 1991244    | YESHIVA AHAVAS TORAH       | 2010               |
| 1991235    | YESHIVA AHAVAS TORAH       | 2010               |
| 1991147    | YESHIVA VYELIPOL           | 2010               |
| 1991141    | YESHIVA VYELIPOL           | 2010               |
|            |                            |                    |
| 2134747    | BNOS MALKA ACADEMY         | 2011               |
| 2134738    | BNOS MALKA ACADEMY         | 2011               |
| 2122475    | CHABAD OF NORTHEAST QUEENS | 2011               |
| 2122714    | YESHIVA AHAVAS TORAH       | 2011               |
| 2184977    | YESHIVA VYELIPOL           | 2011               |

The letter explained that they determined the Bogen Ssystem is Redundant

We would like to appeal this decision and disagree with USAC's finding that the Bogen system is Redundant

The Bogen PBX was set up to be used in conjunction with the primary PBX. A PBX system is put together with numerous components not necessarily all by the same manufacturer. That is the way the Bogen PBX expansion was set up that it is utilized in conjunction with the primary PBX where voice traverses analog circuits, digital lines, IP networks, and many forms of wireless signals.

The primary PBX provides the capability for advanced multiline telephone instruments, IP Telephones, voicemail and standard and advanced telephone line interface such as PRI or SIP Trunks. For the areas of the school or library that require standard telephone service (analog circuits) such as class rooms some schools selected to purchase a Bogen system. The Bogen System and the "primary" PBX are integrated in such a way that they are effectively one system, station-to-station calls and calls to the public switched network flow freely between the two systems.

Additionally we would like point out the fact that the Bogen PBX expansion was also listed as 100% eligible in the USAC Eligible Products Database. Also when the schools applied for the Bogen system USAC was fully aware that the school was applying for a primary PBX it was at times questioned by PIA for the need for the Bogen but USAC was always satisfied with the explanation provided by the schools and they did not consider the Bogen as redundant. It seems the USAC changed their guidelines after the Bogen was installed and paid for.



Slava Lyubarsky

Vice President